

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

CELLULAR COMMUNICATIONS
EQUIPMENT LLC,

Plaintiff,

v.

HTC CORP., et al.,

Defendants.

Civil Action No. 6:13-cv-507

JURY TRIAL DEMANDED
(Consolidated Lead Case)

DEFENDANT APPLE INC.'S MOTION FOR ISSUANCE OF LETTER ROGATORY

Defendant Apple Inc. (“Apple”) hereby moves, pursuant to the Hague Convention on the Taking of Evidence Abroad in Civil or Commercial Matters, March 18, 1970 and 28 U.S.C § 1781 for issuance of a Request for International Judicial Assistance directed to the Ministry of Justice, Finland requesting the production of relevant documents by third-party Nokia Corporation. Apple submits that the requested documents are necessary and in the interest of justice, that Nokia Corporation is not subject to service of a subpoena within the United States, and that it is not possible to obtain the requested documents in an admissible form in any other manner.

For these reasons, Apple respectfully requests that this Court grant this motion and issue the proposed Request for International Judicial Assistance attached hereto as Exhibit A, bearing an original signature by the Court and original seal affixed by the clerk of the Court. Apple makes these specific requests to comply with the requirements for service in Finland.

DATED: September 4, 2015

Respectfully submitted,

/s/ Mark C. Scarsi

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ATTORNEYS FOR DEFENDANT APPLE INC.

CERTIFICATE OF SERVICE

I hereby certify that counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system on the 4th day of September, 2015 per Local Rule CV-5(a)(3).

/s/ Mike Sheen
Mike Sheen